



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 9, 2015

By ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: United States v. Dean Skelos & Adam Skelos,
S1 15 Cr. 317 (KMW)**

Dear Judge Wood:

The Government respectfully writes in response to the Court's inquiry as to examples of statements by Adam Skelos that the Government believes were exaggerations. As a general matter, the exaggerations by Adam Skelos were designed to promote Adam Skelos's importance and to claim that Adam Skelos had directly assisted his father in achieving certain results for the companies that had paid him when in fact certain actions were taken by Dean Skelos alone with Adam Skelos's knowledge. For example, after Dean Skelos had pressured the Nassau County Executive to pay the Environmental Technology Company at a funeral, Adam Skelos claimed that he was also at the funeral and that he himself spoke to the Nassau County Executive. In particular, Adam Skelos called CW-2 (AS#1396) and told him, in substance and in part, that Adam Skelos had attended "a wake" with his father, at which he learned from the Nassau County Executive that the funds allocated to another project were "not going to affect anything that is, you know, we are doing with stormwater" and that money sought by the Environmental Technology Company would soon be paid. This was an exaggeration in the sense that it was Dean Skelos who had obtained the information at the police officer's wake, not Adam Skelos.

cc: G. Robert Gage, Esq.
Christopher Conniff, Esq.